

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

Robin Deborah Novak,

Debtor.

Case No. 25-10046-AMC
Chapter 13

Motion to Extend the Automatic Stay

Debtor Robin Deborah Novak,, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on January 6, 2025. They have yet to file a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b), but will do so in a timely fashion.
2. The Debtor was involved in one active bankruptcy between January 7, 2024, and January 6, 2025:

Case No.	District	Filed	Dismissed	Reason
23-13254	PAEB	10/27/2023	04/08/2024	Failure to make plan payments

3. Because the Debtor was involved in only one active bankruptcy between January 7, 2024, and January 6, 2025, the automatic stay is set to expire on February 5, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. The debtor became unemployed during the previous case which directly contributed towards its dismissal for failure to make plan payments. The debtor has since found gainful employment, providing them with the income necessary to make timely plan payments in the instant case.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: January 6, 2025

CIBIK LAW, P.C.
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